

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

SONDRA BREWER and CHARLES  
BREWER,

Plaintiffs,

v.

PIMEFLIGHT AVIATION SERVICES,  
INC., et al.,

Defendants.

CASE NO. 3:25-cv-01195-JAG

**SPECIAL APPEARANCE AND MOTION FOR EXTENSION OF TIME  
TO PLEAD OR OTHERWISE DEFEND**

**TO THE HONORABLE COURT:**

Frontier Airlines, Inc. (“Frontier”), specially appearing through counsel, without submitting to the jurisdiction or venue of this forum nor waiving any other defense, including the right to challenge the sufficiency of service and personal jurisdiction, very respectfully moves for an extension of time in which to file an answer to the Complaint (at ECF, No. 1) and/or otherwise defend, and in support thereof states as follows:

1. On April 4, 2025, plaintiffs filed a “Complaint” against Frontier and other defendants. See, ECF No. 1.
2. On or about April 9, 2025, plaintiffs purportedly served a copy of the Complaint and summons upon Frontier. The summons returned executed, and filed as ECF No. 6 in the docket for this case, identify the entity upon which process was purportedly served as “Frontier Airlines Holding, Inc.” If service was properly effected, Frontier would have until April 30, 2025 to plead or otherwise respond.
3. To complete its internal examination and responsibly respond to the Complaint or

otherwise plead, Frontier respectfully requests the initial 30-day extension set forth by Local Civil Rule No. 6,<sup>1</sup> to be granted by the Clerk of the Court, to answer or otherwise defend in this matter, such extension to expire on Friday, May 30, 2025.

**WHEREFORE**, pursuant to Local Civil Rule No. 6, Frontier moves for a first extension of time to answer the Complaint or to otherwise plead, said extension to expire on Friday, May 30, 2025.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 29<sup>th</sup> day of April, 2025.

I CERTIFY that today I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record.

**ROMÁN SANTOS LLC**  
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Tomás A. Román-Santos  
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<sup>1</sup> According to Local Civil Rule 6, “[t]he clerk is authorized to enter orders granting a first extension of time, provided it encompasses a period not to exceed thirty (30) days. Any additional extension of time can only be granted by the court. Statutes of limitation may never be enlarged by the clerk. All motions for extension of time shall specifically set forth the reason for the extension sought, the expiration date of the period sought to be extended, and the expiration date of the proposed extension.”